

CAPEPAC

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January 5, 2016

Federal Election Commission
Attn: Christopher Morse,
Senior Campaign Finance Analyst
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

**Re: Requesting Administrative *TERMINATION OF:*
Coalition of Americans for Political Equality PAC
Committee ID: C00493486**

Dear Mr. Morse:

To support the FEC Termination Report filed today by The Coalition of Americans for Political Equality PAC ("CAPE"), a registered Super PAC, please accept this letter as a formal request by CAPE for Administrative Termination of its filing requirements. This request is being made pursuant to Rule 102.4(a) of Chapter 11, CFR. Administrative termination is being requested for several reasons as set forth below.

As the filed reports over the past three years will support, CAPE has not conducted any activity, nor has accepted any donations or performed any election-related or business functions in the last three years with the exception of filing its required periodic FEC reports. The only purpose for which continued filing of periodic reports was to disclose unresolved, disputed debt. CAPE's outstanding debts and obligations exceed the total of the committee's reported cash-on-hand balance as reflected in reports for the last three years.

With respect to the unresolved and disputed debts identified in all FEC filings, each of these were incurred as overcharges for services not requested, or received by CAPE in 2012. As such, formal disputes were immediately lodged with each vendor for the disputed amounts with a demand that they explain the overcharges and a request that they each provide an accounting and verification of their charges against CAPE. These accountings were never received. Along with the disputes, CAPE provided payments of all amounts billed that were not in dispute. All such payments were properly reported in CAPE's FEC filings in 2012.

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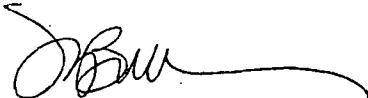
Vendors sent repeated billing statements and in the case of Google, demand letters for payment of the disputed charges. Nothing more was done by the disputed vendors to collect the alleged debts. Each of the vendors listed as disputed debts failed to respond to CAPE's requests for an accounting and justification for the amounts charged.

Numerous attempts by CAPE were made to resolve the disputed debts in the first two years since CAPE operations ceased in September 2012. However, despite offers to settle the disputes, all but Google ignored each of our communications. Google's response was to ignore settlement offers and to periodically continue billing for the disputed amounts on a periodic basis until August 2013 when, no further billings or collection efforts were received by CAPE. The reported debts remain disputed and unresolved as a result. In summary, there has been no attempt by any vendor, including Google, the largest alleged debtor, to collect the funds they claimed was owned to them or to settle the disputes since August 2013. The forgoing notwithstanding, CAPE has no independent assets or income in which to satisfy the disputed debts.

Since CAPE is a registered Super PAC, the committee's outstanding debts and obligations, if treated as a contribution, would not appear to present a possible violation of the 11CFR, parts 110 and 114 contribution prohibitions and limitations.

In summary, I believe that CAPE's circumstance meets the qualifications necessary to allow administrative termination to occur. As such, I request that the FEC take immediate action to administratively terminate CAPE's registration and filing requirements.

Respectfully Submitted,



Margaret Berardinelli
Treasurer

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